

IN THE DISTRICT COURT OF OKLAHOMA COUNTY
STATE OF OKLAHOMA

**FILED IN DISTRICT COURT
OKLAHOMA COUNTY**

VALERIE EASLEY,

Plaintiff,

v.

THEODORE BURZYNSKI, individually and
DESTINY HAGANS, individually, and
TAG OKC, INC., individually,

Defendants.

OCT 15 2019

RICK WARREN
COURT CLERK

Case No.

40

CJ-2019-5831

P E T I T I O N

COMES NOW the Plaintiffs, Valerie Easley, and for her cause of action
state as follows:

1. On or about April 16, 2019, Plaintiff was involved in a collision with automobiles driven by Defendants Theodore Burzynski and Destiny Hagans. The collision occurred near the intersection of I-44 W/B and Pennsylvania, city of Oklahoma City, Oklahoma County, Oklahoma.
2. The collision described above was a direct result of the negligence of Defendants Burzynski and Hagans in that they failed to exercise reasonable care in operating the vehicles they were driving.
3. Defendant Tag OKC, Inc., knowingly entrusted his vehicle to an incompetent and/or reckless driver, Theodore Burzynski, who negligently failed to control his vehicle and collided with Plaintiffs' vehicle proximately causing Plaintiffs' injuries and damages.
4. That as a result of the Defendants' negligence, Plaintiff has incurred medical expenses, loss of earnings, physical pain and suffering and mental pain and suffering.

5. That as a result of the above-reference acts, the Plaintiffs have been damaged in an amount in excess of \$75,000.00.

WHEREFORE, Plaintiff, Valerie Easley, prays for judgment against the Defendants in an amount in excess of \$75,000.00, plus interest, costs, and all other relief this Court deems just and equitable.

Respectfully submitted,

GRIFFIN, REYNOLDS & ASSOCIATES



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OKLAHOMA CITY

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RETURN RECEIPT REQUESTED
THEODORE BURZYNski
360 NEWPORT RD
UNIONDALE NY 11553-1824

Handwritten signature and date 10/21

11553-182460

